

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

* **CRIMINAL NO: 12-109**

v.

* **SECTION: "H"**

JOHN C. WRIGHT, JR.

* **VIOLATION: 18 U.S.C. § 2250(a)**

* * *

FACTUAL BASIS

Should this matter proceed to trial, both the government and the defendant, **JOHN C. WRIGHT, JR.**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would prove the following beyond a reasonable doubt at trial:

The government would present evidence that on or about June 7, 2007, **JOHN C. WRIGHT, JR. (WRIGHT)** entered a plea of guilty to: Unlawful Sexual Conduct with a Minor, in violation of Ohio Revised Code Section 2907.04(a), a felony of the fourth degree; and Illegal Use of Minor in Nudity-Oriented Material or Performance, in violation of Ohio Revised Code Section 2907.323(A)(3), a felony of the fifth degree, in the Common Pleas Court, Ashland County, Ohio, under Case No. 07-CRI-021. On or about the date **WRIGHT** was convicted, he was advised that he would have to register as a sex offender for the remainder of his life. **WRIGHT** was required

to complete a Notice of Registration Duties of Sexually Oriented Offender or Child-Victim Offender Form (Registration Form) every year.

The government would introduce evidence to establish that from on or about September 10, 2007, through on or about June 26, 2011, **WRIGHT** completed approximately 35 Registration Forms. At sometime unknown, but after on or about June 26, 2011, **WRIGHT** moved from Ohio to Louisiana and failed to notify law enforcement authorities of his move to Louisiana.

Further, the government would present evidence that on or about February 8, 2012, Inspectors from the U. S. Marshal's Service located **WRIGHT** in Harvey, Louisiana. Inspectors would introduce evidence recovered from **WRIGHT's** apartment to establish his residency in Louisiana. In addition, witnesses would be called to testify that **WRIGHT** was living in Louisiana.

Further, the government would introduce post-*Miranda* statements made by **WRIGHT** wherein **WRIGHT** voluntarily admitted that he was aware of his Sex Offender Registration requirements and that he did not tell law enforcement officials in Ohio that he was leaving. He stated that he had not registered in Jefferson Parish, but was aware that he should have registered. **WRIGHT** also admitted that he was aware that there was a school several blocks away from his residence and that he worked for a haunted house during Halloween.

Further, the government would call a fingerprint examiner to testify that the fingerprints from **WRIGHT's** original Ohio conviction are identical to the fingerprints taken at the time of his February 2012 federal arrest.

JOHN C. WRIGHT, JR.
Defendant

DATE

GEORGE CHANEY, JR.
Counsel for Defendant

DATE

BRIAN M. KLEBBA
Assistant United States Attorney

DATE